

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

Case No. 1:15-cv-00706-TSE-IDD

DISH NETWORK L.L.C., AL JAZEERA )  
MEDIA NETWORK, ASIA TV USA )  
LTD., B4U U.S., INC., GEO USA LLC, )  
IMPRESS TELEFILM, INC., MBC FZ )  
LLC, MSM ASIA LTD., SOUNDVIEW )  
BROADCASTING LLC, SOUNDVIEW )  
ATN LLC, STAR INDIA PRIVATE LTD., )  
and VIACOM18 MEDIA PRIVATE )  
LIMITED, )  
)  
Plaintiffs, )  
)  
)  
v. )  
)  
)  
SHAVA IPTV NETWORK LLC, )  
NADEEM BUTT, IMRAN BUTT, and )  
NAEEM BUTT, individually and together )  
d/b/a Shava TV, Cres IPTV, Iraa Enterprises, )  
and Maple Electronics, )  
)  
Defendants. )

**PLAINTIFF DISH NETWORK L.L.C.'S BRIEF IN SUPPORT OF  
MOTION TO AMEND CONTEMPT ORDER**

1. Defendants have circumvented the relief set forth in the February 22, 2018 Order (“Order”) granting DISH’s motion for contempt by using another domain and registering backup domains to continue selling and supporting their copyright infringing service in violation of the Order and permanent injunction.

2. The Order enjoined the distribution, sale, and promotion of Shava TV set-top boxes and services. (Doc. 138 at 2.) Defendants were using the Shavatv.com domain for the sale and support of their Shava TV set-top boxes and services. (Doc. 136, Mag. Rep.at 6.) The Order instructed the registries and registrars of Shavatv.com, including VeriSign, to transfer the domain name to DISH. (Doc. 138 at 2.)

3. Shavatv.com has been disabled, but has not been fully transferred to DISH, because VeriSign refused to do so without specific language in a court order and the registrar OnlineNIC, Inc. will not approve the transfer. (*See* Ferguson Decl. ¶ 2, Exs.1-2.)

4. Defendants are now using the Shava-tv.com domain for the distribution, sale, and promotion of Shava TV set-top boxes and services. (*Id.* ¶ 3, Ex. 3.) Defendants have also registered backup domains including Shavagold.com, Shavagoldtv.com, Shavamx.com, S-mxvtv.com, Tvshava.com, apparently anticipating further court orders transferring their domains. (*Id.* ¶ 4, Ex. 4.)

5. DISH requests that the Court amend its Order granting DISH's motion for contempt to add Defendants' additional domains and include the specific language that VeriSign requires to transfer the domains to DISH.

6. Specifically, DISH asks the Court to enter an order stating:

It is further **ORDERED** that VeriSign, Inc., OnlineNIC, Inc., and any relevant registries and registrars holding or listing the domain names Shavatv.com, Shava-tv.com, Shavagold.com, Shavagoldtv.com, Shavamx.com, S-mxvtv.com, Tvshava.com, and any other domain names now or hereafter used by Defendants to distribute, sell, or promote Shava TV set-top boxes or services, upon receiving actual notice of this Order, shall (i) temporarily disable the domain names through a registry hold or otherwise, and make them inactive and non-transferable; and (ii) transfer these domain names to plaintiff DISH Network L.L.C., including changing the registrar of record to the registrar selected by plaintiff at plaintiff's reasonable expense and reenabling the domains so that plaintiff may fully control and use the domain names.

Dated: April 14, 2018

Respectfully submitted,

/s/ Bradshaw Rost

Bradshaw Rost, Esq., VSB Bar #27134

**Tenenbaum & Saas, P.C.**

4504 Walsh Street, Suite 200

Chevy Chase, MD 20815

(301) 961-5300 – Tel

(301) 961-5395 – Fax

brost@tspclaw.com

Joseph H. Boyle, Esq. (*pro hac vice*)

Timothy M. Frank Esq. (*pro hac vice*)

**Hagan Noll & Boyle, LLC**

Two Memorial City Plaza

820 Gessner, Suite 940

Houston, TX 77024

(713) 343-0478 – Tel

(713) 758-0146 – Fax

joe.boyle@hnbllc.com

timothy.frank@hnbllc.com

*Attorneys for Plaintiff DISH Network L.L.C.*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 16, 2018 a true and correct copy of Plaintiff DISH Network L.L.C.'s Brief in Support of Motion to Amend Contempt Order was placed in a sealed envelope with postage thereon fully prepaid and deposited in the United States mail, first class, to the following non-CM/ECF participants:

Defendant Nadeem Butt  
Defendant Shava IPTV Network LLC  
15260 Lord Culpeper Court  
Woodbridge, Virginia 22191

Defendant Imran Butt  
52 West Park Avenue  
Bradford, Ontario, L3Z 0A4  
Canada

Defendant Naeem Butt  
16 Peridot Road  
Brampton, Ontario, L6P 0Z5  
Canada

/s/ Bradshaw Rost  
Bradshaw Rost, Esq., VSB Bar #27134  
**Tenenbaum & Saas, P.C.**  
4504 Walsh Street, Suite 200  
Chevy Chase, MD 20815  
(301) 961-5300 – Tel  
(301) 961-5395 – Fax  
brost@tspclaw.com